REMARKS

I. Introduction

In the Office Action dated September 8, 2005, the Examiner rejected claims 1, 4, 6, 8, 9, 12, 14, 15, 17-19, 21 and 22 under 35 U.S.C. § 103(a) as being unpatentable over C. Rigney, <u>RFC 2865 – Remote Authentication Dial In User Service (RADIUS)</u>, (2000), http://www.faqs.org/rfcs/rfc2865.html ("Rigney") in view of U.S. Pat. No. 6,233,608 ("Laursen") and information disclosed in the background section of the current application. Further, claims 2, 3, 5, 7, 10, 11, 13, 16, and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Rigney in view of Laursen, the background of the current application, and U.S. Pat. No. 5,113,499 ("Ankney").

In this Amendment, claims 1-4, 6-12, and 14-29 have been amended. Applicants respectfully request reconsideration of the claims and withdrawal of the rejections to the claims in light of the amendments to the claims and the following remarks.

II. The Proposed Combination of Rigney, Laursen, and the Background of the Current Application Does Not Render the Independent Claims Unpatentable

The currently-claimed invention is directed to a method and system for providing a digital subscriber line ("DSL") internet system that offers improved access authentication and security. Generally, each of the amended independent claims recites a subscriber sending a service request for DSL internet services to a DSL internet service provider. In response to receiving the request for DSL internet service, a line identifier associated with a port assigned to the subscriber is retrieved from a data base and transferred to the DSL internet service provider. The DSL internet service provider then authenticates the service request for DSL internet service based on the line identifier, wherein the DSL internet service provider only authenticates the service request if the subscriber sends the service request through the port associated with the line identifier. Rigney, Laursen, and the background of the current application all fail to disclose at least a method or system that associates a line identifier with a port assigned to a subscriber of DSL internet service for the purpose of authenticating a service request for DSL internet service based on the line identifier.

10

Rigney discloses a protocol for carrying authentication, authorization, and configuration information between a shared Authentication Server and a Network Access Server that desires to authenticate its links. As admitted by the Examiner, Rigney fails to disclose associating a line identifier with a port assigned to a subscriber wherein the line identifier is usable to authenticate a service. Thus, Rigney necessarily does not disclose associating a line identifier with a port assigned to a subscriber of DSL internet service for the purpose of authenticating a service request for DSL service based on the line identifier.

Like Rigney, Laursen also fails to disclose associating a line identifier with a port assigned to a subscriber of a DSL internet service for the purpose of authenticating a service request for DSL service based on the line identifier. Laursen discloses a system that authenticates users of devices having limited computer power such as cellular phones. In Laursen, a user may access a service provider using any conventional personal computer ("PC") or a device with limited computing power such as a cell phone. When using a PC, a user may send a service request to a service provider through any number of different ports associated with any number of internet connections. As long as the user inputs the correct login ID and password, the service provider will authenticate the service request from the user using a PC. Alternatively, when using a personal device such as a cell phone, a user sending a service request to a service provider through a port will be authenticated by the service provider so long as the device id associated with the service port is correct. In the office action dated Sept. 8, 2005, the Examiner asserts that Laursen shows it is obvious to authenticate service requests based on line identifiers. While Laursen may disclose a cell phone being authenticated by a service provider so long as the device id associated with the service port is correct, Laursen does not establish that it is obvious for any type of service request, such as a service request for DSL service, to be authenticated from any type of device, such as a personal computer or laptop, based on a line identifier associated with a DSL subscriber.

Like Rigney and Laursen, the background of the current application also fails to disclose associating a line identifier with a port assigned to a subscriber of DSL internet service for the purpose of authenticating a service request for DSL service based on the

11

line identifier. In the office action dated Sept. 8, 2005, the Examiner relies on the background of the current disclosure to establish that it is known for broadband internet service providers to use a RADIUS protocol for authentication. The background of the current disclosure only discusses using the RADIUS protocol to authenticate users based on a username and password. The background of the current disclosure does not disclose associating a line identifier with a port assigned to a subscriber of DSL internet service for the purpose of authenticating a service request for DSL service based on the line identifier.

To establish a prima facie case of obvious, the combined references must teach or suggest each claim limitation. (See MPEP § 2142). As explained above, none of the cited references disclose or suggest associating a line identifier with a port assigned to a subscriber of DSL internet service for the purpose of authenticating a service request for DSL service based on the line identifier as recited in the independent claims. Thus, any combination of Rigney, Laursen, and the background of the current application necessarily cannot render the independent claims, or any claims that are dependent on the independent claims, unpatentable. Applicants respectfully request the withdrawal of the rejection to claims 1, 4, 6, 8, 9, 12, 14, 15, 17-19, 21 and 22 under 35 U.S.C. § 103(a).

III.   **The Addition of Ankey to the Proposed Combination Does Not Render the Currently-Claimed Invention Unpatentable**
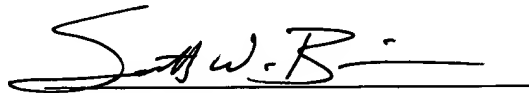
Claims 2, 3, 5, 7, 10, 11, 13, 16, and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Rigney in view of Laursen, the background of the current application, and Ankey. Ankey is directed to a security access management system for a packet switched data communications network. Ankey is not directed to DSL networks and does not disclose associating line identifiers with ports assigned to subscribers of DSL service. Like Rigney, Laursen, and the background of the current application, Ankey also does not disclose associating a line identifier with a port assigned to a subscriber of DSL internet service for the purpose of authenticating a service request for DSL service based on the line identifier as recited in the independent claims. Thus, any combination of Rigney, Laursen, the background of the current

12

application, and Ankey necessarily cannot render the independent claims, or any claims that is dependent on the independent claims, unpatentable. Applicants respectfully request the withdrawal of the rejection under 35 U.S.C. § 103(a).

IV. CONCLUSION

In view of the foregoing amendment and remarks, Applicants submit that the pending claims are in condition for allowance.[1] Reconsideration is therefore respectfully requested. If there are any questions concerning this Response, the Examiner is asked to phone the undersigned attorney at (312) 321-4200.

Respectfully submitted,

Scott W. Brim
Registration No. 51,500
Attorney for Applicants

BRINKS HOFER GILSON & LIONE
P.O. BOX 10395
CHICAGO, ILLINOIS 60610
(312) 321-4200

---

[1] Please note that further to the conversation between the Examiner and Scott W. Brim on Dec. 8, 2005, it is Applicants understanding that the objection to the drawings is still being held in abeyance.